WWR#21235712

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK (POUGHKEEPSIE)
---X
In re: Chapter 13

EDWARD F. SADOWSKI Case No. 16-36051-cgm
MADGE B. SADOWSKI

Debtor(s)
---X

OBJECTION OF CREDITOR, KEYBANK NATIONAL ASSOCIATION, TO DEBTORS' CHAPTER 13 CONFIRMATION

Now comes Creditor, KeyBank National Association (hereinafter referred to as "KeyBank"), party in interest in the above Chapter 13 proceeding and hereby OBJECTS to the Debtors' proposed Chapter 13 Plan (hereinafter referred to as "Plan"). For the factual, legal and statutory bases set forth in the attached Memorandum, confirmation of the Debtor's Plan should be DENIED.

Respectfully submitted,

/s/ Geoffrey J. Peters

GEOFFREY J. PETERS
Weltman, Weinberg & Reis Co., L.P.A.
3705 Marlane Drive
Grove City, Ohio 43123
Tel: 614/883-0678
Fax: 614/801-2601
gpeters@weltman.com

Counsel for Creditor
KeyBank National Association

MEMORANDUM

The Debtors executed a Key Equity Options Agreement and Mortgage on or about June 7, 2007 regarding the real property located at 115 Pine Dr., New Windsor, NY 12553. The Debtors filed Chapter 13 Bankruptcy on June 2, 2016. The amount due and owing on KeyBank's Claim is $69,240.21.

KeyBank states that the Debtors' proposed Plan fails to properly list and provide for KeyBank's claim. As such, KeyBank is denied adequate protection under the Plan.

WHEREFORE, confirmation should be denied under 11 U.S.C. § 1325(a)(5).

Respectfully submitted,

/s/ Geoffrey J. Peters
GEOFFREY J. PETERS
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Grove City, Ohio 43123
Tel: 614/883-0678
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Counsel for Creditor
KeyBank National Association

STATE OF OHIO)
COUNTY OF FRANKLIN) ss.:

STEPHANIE LEE, being duly sworn, deposes and says: deponent is not a party to the action, is over 18 years of age and resides at Columbus, Ohio.

On August 1, 2016 deponent served the within

OBJECTION TO CONFIRMATION OF CHAPTER 13 PLAN

upon the following parties, at the addresses designated by said parties for that purpose, by depositing a true copy of same, enclosed in a post-paid properly addressed wrapper in an official depository under the exclusive care and custody of the United States Postal Service within the State of Ohio:

UNITED STATES TRUSTEE
UNITED STATES TRUSTEE
74 CHAPEL STREET
ALBANY, NY 12207

EDWARD F. SADOWSKI
115 PINE DRIVE
NEW WINDSOR, NY 12553

MADGE B. SADOWSKI
115 PINE DRIVE
NEW WINDSOR, NY 12553

JULIUS A. RIVERA, JR.
309 MILL STREET
POUGHKEEPSIE, NY 12601

JEFFREY L. SAPIR-13
AS CHAPTER 13 AND 12 TRUSTEE
399 KNOLLWOOD ROAD
SUITE 102
WHITE PLAINS, NY 10603

/s/Stephanie Lee
Stephanie Lee, Legal Assistant

Sworn to before me
August 1, 2016
/s/ Bobbi Jo Cooney
Notary Public, State of Ohio
Qualified in Franklin County
Commission Expires 06/8/2021